

1 **THE WESBROOKS LAW FIRM, P.L.L.C.**

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8 (Admitted Pro Hac Vice)

9 Attorney for Robert Williamson, III and Cate Waken-Williamson

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ROBERT WILLIAMSON, III an individual,

13 Plaintiff,

14 vs.

15 VICTORIA L. GUNVALSON, an individual;  
16 DAVID BROOKS AYERS, an individual,

17 Defendants.

18 DAVID BROOKS AYERS, an individual,

19 Counterclaimant,

20 vs.

21 ROBERT WILLIAMSON, III, an individual;  
22 CATE WAKEN-WILLIAMSON, an  
23 individual; and ANGELA TORRES, an  
24 individual,

25 Counterdefendants.

26 BASE CASE NO.:

27 2:13-cv-01019-JAD- GWF

28 MEMBER CASE NO.:

2:13-cv-02022-JAD-GWF

29 **NOTICE OF SETTLEMENT OF ALL  
30 CLAIMS BY AND BETWEEN ROBERT  
31 WILLIAMSON, III, VICKI'S VODKA,  
32 LLC, VICTORIA GUNVALSON, AND  
33 CATE WAKEN-WILLIAMSON**

34 COMES NOW, Plaintiff, pursuant to rule 23.1 (C), Federal Rules of Civil

35 Procedure, and hereby gives notice to the Court that Plaintiffs, Robert Williamson III and

1 Vicki's Vodka LLC, Defendant Victoria L Gunvalson and Counter-defendant Cate  
2 Williamson, have reached settlement terms which resolve the entirety of their claims  
3 against such parties. Such Settlement must be approved by Williamson's Chapter 13  
4 Trustee and the Bankruptcy Court in the District of Arizona.

5 In light of settlement terms having been achieved, it is requested that matters by  
6 and between such parties, including the pending Plaintiff's Motion To Rescind  
7 Interlocutory Judgment for Attorney's Fees (Doc. [142](#)) and Defendant Gunvalson's Ex  
8 Parte Application for Order and Leave to Submit Late Opposition (Doc. [147](#)) be abated  
9 until further notice.

10 The parties expect to submit an agreed order for dismissal upon approval of  
11 settlement of the bankruptcy court, which the parties believe can be accomplished within  
12 the next 60 days. The parties believe that a status conference would be appropriate at or  
13 near such time in the event that more time is required to present an agreed order for  
14 dismissal of claims.

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16 Respectfully submitted, this 19th day of March, 2018.

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21 **THE WESBROOKS LAW FIRM, P.L.L.C**

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23 By: /s/ Mark Wesbrooks  
24 Mark Wesbrooks, State Bar No. 018690  
25 Attorney for Plaintiff  
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4 **CERTIFICATE OF SERVICE**

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10 I, Mark Wesbrooks, hereby certify that on March 19, 2018, I filed through the Court's  
11 ECF system and served either through the ECF system or by electronic mail the foregoing  
12 document described as: **NOTICE OF SETTLEMENT OF ALL CLAIMS BY AND  
13 BETWEEN ROBERT WILLIAMSON, III, VICKI'S VODKA, LLC, VICTORIA  
14 GUNVALSON, AND CATE WAKEN-WILLIAMSON** using the Court's electronic filing  
15 system. A copy of the foregoing document(s) will be served via the Court's electronic filing  
16 system on interested parties in this action, or by email/regular mail as follows:

17 **2:13-cv-01019-JAD-GWF Notice has been electronically mailed to:**

18

19 Edward Randall Miley  
20 emiley@mileylaw.com

21 Sean Patrick Reis  
22 sreis@reisfirm.com

23 Tony L. Abbatangelo  
24 LasVegasLawoffice@gmail.com

25 Boris Treyzon  
26 btreyzon@actslaw.com

27 **Regular First Class Mail, and as Indicated on same date:**

28 Brooks Ayers  
29 8594 E. 116<sup>th</sup> Street, #246  
30 Fishers IN 46038 *via US Mail and via email*

31 Angela Torres  
32 6715 Rim Rock Circle, Northwest  
33 Albuquerque, NM 87120

34 Michael Nicholson  
35 P.O. Box 32  
36 Calistoga, CA 94515

37 /s/Mark Wesbrooks

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NOTICE OF SETTLEMENT OF ALL CLAIMS BY AND BETWEEN ROBERT WILLIAMSON, III, VICKI'S VODKA, LLC, VICTORIA GUNVALSON, AND CATE WAKEN-WILLIAMSON 4